

Case No. 08 CV 1794

3007051-ELS

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PRACTICE MANAGEMENT SUPPORT SERVICES, INC., an Illinois corporation, individually and as the representative of a class of similarly-situated persons,

Plaintiff,

V.

CODING STRATEGIES, INC.

Defendant.

Case No. 08 CV 1794

Judge James F. Holderman

## REPORT OF THE PARTIES' PLANNING MEETING

1. The following persons participated in a Rule 26(f) Conference on July 3, 2008 by telephone:

Brian J. Wanca, one of the attorneys representing the Plaintiff  
Eric Samore, one of the attorneys representing the Defendant

## 2. Initial Disclosures

Plaintiff served Defendant with its initial disclosure on April 4, 2008. Defendant will complete and serve Plaintiff with its initial disclosure on or before July 17, 2008.

3. **Discovery Plan** The parties propose this discovery plan in the event that this court denies Defendant's motion to bifurcate:


- (a) Rule 23 Discovery will be needed on the following subjects: numerosity, commonality, typicality, and adequacy.
- (b) Written discovery for Rule 23 issues will be commenced on or before July 11, 2008. Fact discovery for Rule 23 issues will be completed by January 31, 2009.
- (c) The maximum number of Interrogatories by each party to another shall be 40. Answers to Interrogatories will be due 30 days after service.

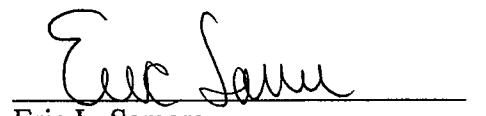
- (d) The maximum number of Requests for Admission by each party to another shall be 50. Responses are due 30 days after service.
- (e) Depositions shall be limited to 6 hours. The parties can petition the Court for more time upon showing of good cause.
- (f) Plaintiff's opinion witness disclosure and report for Rule 23 purposes shall be on or before February 15, 2009. Defendant's opinion witness disclosure and report for Rule 23 purposes shall be due 30 days thereafter.
- (g) Supplementations under Rule 26(e) shall be on or before February 15, 2009.

4. **Other Items**

- (a-b) Not applicable.
- (c-d) Final dates for the parties to amend pleadings or to join parties is March 15, 2009.
- (e) Plaintiff's Motion for Class Certification shall be filed 14 days after plaintiff's opinion witness has been deposed.
- (f) Because the parties are investigating their claims/defenses, they believe that the matter is not ripe for settlement at this time.
- (g) The parties believe that ADR would not enhance settlement prospects at this time. However, the parties will notify the court if and when they are ready for ADR.
- (k) The parties request a status with this Court after fact discovery has been concluded.

Dated this 8 day of July, 2008

  
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